

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA                  )        M.B.D. No.: 03-10403-RJS  
    )  
    )  
    )  
    )  
v.    )  
    )  
    )  
ROBERT RAMOS                                )

JOINT MOTION TO EXTEND TIME WITHIN WHICH  
INDICTMENT MUST BE FILED

Pursuant to Title 18, United States Code, Section 3161(b), the United States of America and Defendant Robert Ramos move to extend the time within which an indictment must be filed in the above-captioned case. As grounds for this motion, the parties state that Defendant Ramos has retained new counsel in this case. Defense counsel is aware that the parties have been engaged in discussions which could resolve this case prior to the filing of an indictment. Before defense counsel can advise the Defendant about whether to resolve this case prior to the filing of an Indictment, he must familiarize himself with the evidence against the Defendant, review that evidence with the Defendant, counsel the Defendant about his options within the legal process, and engage in further discussions and negotiations with the government. Because the undersigned counsel for the government is scheduled for trial beginning April 12, 2004, in the case captioned United States v. Michael D'Amico, Criminal No. 02-10283-RWZ, the parties anticipate that those discussions and negotiations will not be completed before May 11, 2004.

For the foregoing reasons, the parties request that the time within which an indictment must be filed in this case be extended until May 11, 2004. The parties further move that the

Court issue an order of excludable delay to include the time from the filing of this motion until May 11, 2004.

Respectfully submitted,

MICHAEL J. SULLIVAN  
UNITED STATES ATTORNEY

By:

  
EMILY R. SCHULMAN  
Assistant U.S. Attorneys

ROBERT RAMOS  
Defendant

By:

  
BARRY WILSON, ESQ.  
Counsel for Defendant Ramos

Dated: March 19, 2004